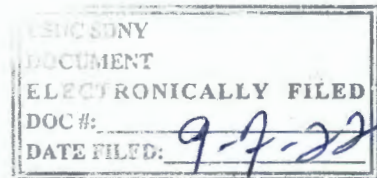


**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**



TERRA TOWERS CORP., TBS
MANAGEMENT, S.A., and DT HOLDINGS,
INC.,

Petitioners,

-against-

TELECOM BUSINESS SOLUTION, LLC,
LATAM TOWERS, LLC, and AMLQ
HOLDINGS (CAY) LTD.,

Respondents.

Case No. 1:22-cv-07301-LAK-RWL

**NOTICE OF MOTION FOR LEAVE
TO FILE AMENDED PETITION
UNDER SEAL**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion for Leave to File Under Seal, Petitioners Terra Towers Corp., TBS Management, S.A., and DT Holdings, Inc., by their attorneys, hereby move this Court pursuant to Federal Rule of Civil Procedure 15.2(d) for an Order granting leave to file under seal Petitioners' Amended Petition.

Dated: New York, New York
September 6, 2022

Respectfully submitted,

LUPKIN PLLC

By: /s/ Jonathan D. Lupkin
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Grated
SO ORDERED

[Signature]
LEWIS A. KAPLAN, USDJ
9/7/22

Counsel for Petitioners